

HAGENS BERMAN

Steve Berman steve@hbsslaw.com

ATTORNEYS AT LAW

HAGENS BERMAN SOBOL SHAPIRO LLP  
1301 SECOND AVENUE, SUITE 2000  
SEATTLE, WA 98101

hbsslaw.com

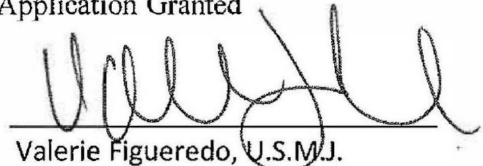
(206) 268-9320 phone (206) 623-0594 fax

March 6, 2023

**VIA ECF**

Hon. Valerie Figueredo  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: 3-7-2023

For the reasons stated at ECF No. 148, Plaintiff's motion to seal/redact is GRANTED. The Clerk of Court is directed to terminate the motion at ECF No. 186. **SO ORDERED.**

Re: *Bookends & Beginnings LLC v. Amazon, et al.*  
Case No. 21-cv-02584-GHW-VF (S.D.N.Y.)

Dear Magistrate Judge Figueredo:

Plaintiff submits this letter seeking leave to file portions of Plaintiff's Consolidated Response to Defendants' Motions to Dismiss [ECF Nos. 179 and 181] ("Response") under seal. The Response quotes from and includes substantial discussion of the Big Five Publisher Defendants'<sup>1</sup> confidential agreements relating to the sale of their print books to Defendant Amazon. Plaintiff seeks leave to seal consistent with the Court's prior sealing orders. *See* ECF Nos. 84, 120, 148, 165, 173, 174. The Defendants consented to the motion and provided the proposed redactions.

Plaintiff therefore requests leave to file portions of the Response under seal and will file a redacted version on ECF.

Sincerely,

HAGENS BERMAN SOBOL SHAPIRO LLP



Steve W. Berman

cc: All Counsel of Record (via ECF)

---

<sup>1</sup> Hachette Book Group, Inc.; HarperCollins Publishers L.L.C.; Macmillan Publishing Group, LLC; Penguin Random House LLC; and Simon & Schuster, Inc.